

FILED
 UNITED STATES DISTRICT COURT
 DISTRICT OF MASSACHUSETTS

FILED UNDER SEAL

UNITED STATES OF AMERICA)	No. 13-CR-10200-GAO
)	
v.)	
)	
)	
DZHOKHAR TSARNAEV)	

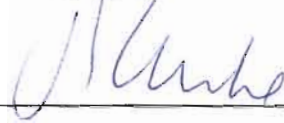
**SEALED MOTION TO SEAL SUPPLEMENTAL MEMORANDUM IN SUPPORT OF
 MOTION TO VACATE SAMs AND ACCOMPANYING DECLARATION**

Defendant, Dzhokhar Tsarnaev, through counsel, respectfully moves to seal the accompanying Supplemental Memorandum in Support of Motion to Vacate SAMs. As grounds therefor, the motion refers to visits to Mr. Tsarnaev at FMC Devens by his two sisters. Prison officials have requested that the defense refrain from publicizing the fact of these visits. Such publicity would likely provoke a wave of press harassment of the sisters and could also put their safety at risk. Should the Court wish for some portion of the Memorandum to be filed publicly, undersigned counsel have appended a proposed redacted version that could be filed on the public docket.

In addition, defendant moves to seal and to file *ex parte* the accompanying declaration of the lead defense mitigation specialist, as it contains information regarding the defense investigation and theories that constitute attorney work product and should therefore remain confidential.

Respectfully submitted,

DZHOKHAR TSARNAEV
by his attorneys




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Certificate of Service

I, Judy Clarke, hereby certify that I have served a copy of the foregoing document on counsel of record for the government on this 11th day of February, 2014, by e-mail PDF.



Judy Clarke